

1 Jun Dam (*Pro Se*)
2 5432 Geary Blvd #535
3 San Francisco, CA 94121
4 Phone: (415) 748-1113
5 Email: jundam@hotmail.com

The Honorable Frederick P. Corbit
Chapter 7

6 **UNITED STATES BANKRUPTCY COURT**
7 **EASTERN DISTRICT OF WASHINGTON**

8
9 In re:

10 GIGA WATT INC.,

11 Debtor

Case No. 18-03197-FPC

12 **MOTION TO DISMISS MOTION**
13 **FOR SANCTIONS**

14
15 **MOTION TO DISMISS MOTION FOR SANCTIONS**

16 **TO THE HONORABLE COURT:**

17
18 **1. Introduction**

19 This motion seeks dismissal of the Trustee's Motion for Sanctions for Unauthorized Practice of
20 Law. The claims in the motion are factually and legally insufficient and fail to establish that I
21 engaged in unauthorized practice.

22
23 **2. Background**

24 I am a creditor in this case with a direct interest in ensuring that my rights are protected. As part
25 of these proceedings, I have filed objections and joinders in matters impacting my claims. These
26 filings are limited to preserving my personal rights, as permitted under bankruptcy law.

3. Legal Standard

Under well-established case law, see **Palazzo v. Gulf Oil Corp., 764 F.2d 1381, 1385 (11th Cir. 1985)**, individuals may represent their personal interests pro se in legal proceedings. However, representing the interests of others without being licensed to practice law constitutes unauthorized practice. In this case, my filings were strictly limited to advocating for my personal claims as a creditor and did not constitute representation of other parties.

4. Argument

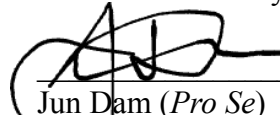
- **No Legal Representation:** All filings were made in furtherance of my rights as a creditor. I did not act as an attorney or provide legal services to other creditors.
- **Improper Use of Sanctions:** Sanctions are punitive and require clear evidence of misconduct. The Trustee's motion fails to meet this burden, relying on speculative claims.
- **Prejudice:** The sanctions motion imposes an unnecessary burden on my right to participate as a creditor and should be dismissed to preserve judicial resources.

5. Conclusion

For the reasons stated, I respectfully request this Court dismiss the Trustee's Motion for Sanctions without a hearing.

Respectfully submitted,

Dated this 18th day of November, 2024



Jun Dam (*Pro Se*)
5432 Geary Blvd #535
San Francisco, CA 94108
Phone: (415) 748-1113
Email: jundam@hotmail.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on 11/18/24 I electronically filed the foregoing **MOTION TO DISMISS
MOTION FOR SANCTIONS** with the Clerk of Court using the CM/ECF system, which will
send notification of such filing to all ECF participants.

Date Served: 11/18/2024

Sign your name:

A handwritten signature in black ink, appearing to be 'Jun Dam', written over the text 'Sign your name:'.

Print name: Jun Dam